

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

GROVANO INC.,)
individually and on behalf of all)
others similarly situated,)
)
Plaintiff,)
)
v.) Case No. 5:24-cv-00404-JKP-HJB
)
UNITED ENROLLMENT SERVICES,)
LLC, et al.,)
)
Defendants.)

STIPULATION OF DISMISSAL WITH PREJUDICE

COMES NOW, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Grovano Inc. and Defendants United Enrollment Services LLC (“UES”) and Neo Insurance Solutions LLC (“NEO”) hereby stipulate that Plaintiff’s individual claims in this action shall be dismissed with prejudice, and without prejudice as to any claims of the putative class members, and with Plaintiff, UES, and NEO bearing their own respective fees and costs.

SO STIPULATED:

/s/ Andrew Roman Perrong
Andrew Roman Perrong
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com
Counsel for Plaintiff

/s/ Mitchell N. Roth
Mitchell N. Roth
Roth Jackson Gibbons Condlin, PLC
8200 Greensboro Drive, Suite 820
McLean, VA 22102
703-485-3535
Email: mroth@rothjackson.com

Joseph P. Bowser, *pro hac vice*
Roth Jackson Gibbons Condlin, PLC
1519 Summit Ave., Suite 102
Richmond, VA 23230
804-441-8701
Fax: 804-441-8438
Email: jbowser@rothjackson.com

Counsel for United Enrollment Services LLC

/s/ Matthew D. Giadrosich
Matthew D. Giadrosich
Mark Wilson Stout
Padfield & Stout, LLP
100 Throckmorton Street, Suite 700
Fort Worth, TX 76102
817-338-1616
Email: mdg@padfieldstout.com
mstout@padfieldstout.com

Yaniv Adar, *pro hac vice*
Stephanie Peral, *pro hac vice*
Mark Migdal & Hayden
80 SW 8th Street
Suite 1999
Miami, FL 33130
305-374-0440
305-367-8650
Email: yaniv@markmigdal.com
stephanie@markmigdal.com

Counsel for Defendant Neo Insurance Solutions LLC

CERTIFICATE OF SERVICE

I hereby certify that, on November 20, 2024, I electronically filed the foregoing Stipulation of Dismissal with Prejudice using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record as follows:

Andrew Roman Perrong, Esq.
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com
Counsel for Plaintiff

Yaniv Adar
Stephanie Peral
Mark Migdal & Hayden
80 SW 8th Street, Suite 1999
Miami, FL 33130
Email: yaniv@markmigdal.com
stephanie@markmigdal.com

Jessica N. Alt
Mark Wilson Stout
Matthew D. Giadrosich
Padfield & Stout, LLP
100 Throckmorton Street, Suite 700
Fort Worth, TX 76102
Email: jalt@padfieldstout.com
mstout@padfieldstout.com
mdg@padfieldstout.com

Counsel for Grovano Inc.

/s/ Andrew Roman Perrong
Andrew Roman Perrong